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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 RICHARD ZEITLIN, ADVANCED
13 TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
14 RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
15 CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., and UNIFIED
16 DATA SERVICES,

17 Plaintiffs,

18 v.

19 BANK OF AMERICA, N.A., and JOHN and
JANE DOES 1-100,

20 Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO AND REPLY IN SUPPORT OF
PLAINTIFFS' RULE 37(d) AND RULE
37(a) MOTION FOR SANCTIONS AND
TO COMPEL FOR DEFENDANT'S
FAILURE TO PRODUCE A PROPER
RULE 30(b)(6) DEPONENT**

(FIRST REQUEST)

22 Pursuant to Local Rules IA 6-1, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced
23 Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American
24 Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified
25 Data Services (the "Plaintiffs") and Defendant Bank of America, N.A. ("BANA"), by and
26 through their respective undersigned counsel of record, submit this Stipulation and Proposed
27 Order for a 2-week extension of BANA's deadline to file its response to Plaintiffs' Rule 37(d)
28 and Rule 37(a) Motion for Sanctions and to Compel for Defendant's Failure to Produce a Proper

1 Rule 30(b)(6) Deponent (ECF No. 148) (the “Motion”). The Motion was filed on August 4, 2021
2 and is set for hearing on September 28, 2021. The Parties request an extension from August 18,
3 2021, BANA’s current deadline to respond, to September 1, 2021.

4 The Parties also request that the deadline for Plaintiffs to file a reply in support of their
5 Motion be extended to September 15, 2021. Plaintiffs’ deadline to file a reply is currently seven
6 days after BANA files its response.

7 This is the Parties’ first request for an extension of the briefing deadlines for the Motion
8 and is not intended to cause any delay or prejudice to any party. The reason for the extension is to
9 give the Parties time to evaluate and respond to the arguments set forth in the Motion and
10 BANA’s response to the Motion.

11 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time
12 for BANA to file their response to the Motion is extended to and through September 1, 2021 and
13 the time for Plaintiffs to file their reply in support of the Motion is extended to and through
14 September 15, 2021.

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1 **IT IS SO STIPULATED.**

2 Dated: August 5, 2021

Dated: August 5, 2021

3 THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

4 /s/ Daniel James Treuden

/s/ Holly E. Cheong

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20 *Attorneys for Plaintiffs*

21 **IT IS SO ORDERED**

22 **DATED: August 09, 2021**

23 

24 **BRENDA WEKSLER**

25 **UNITED STATES MAGISTRATE JUDGE**